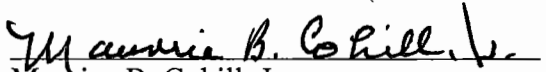


1. **CONFIDENTIAL STATEMENTS.** Prior to and in preparation for the Conference counsel shall comply with the following:
- a. Chief trial counsel and all parties shall attend in person and be prepared to discuss settlement options in detail.
  - b. Necessary representative(s) of any insurance carrier shall be physically present or available by phone.
  - c. No later than **July 5, 2016**, both parties shall submit confidential statements to the Court detailing the key facts, key legal issues, and settlement positions, including monetary amounts. The statements will not be filed or shared with opposing counsel. Accordingly, candor is expected. The letters may be mailed to Chambers at the above address, faxed to Chambers at 412-208-7387, or emailed to Judge Cohill's law clerk, at Barbara Marzina@pawd.uscourts.gov.

2. **MEET AND CONFER.** The parties shall meet and confer and shall jointly file a Report no later than **July 1, 2016**, indicating proposals for the following:

- Expert discovery deadlines (if necessary), including reports and depositions of experts;
- Dates by which dispositive motions pursuant to Fed. R. Civ. P. 56, replies thereto and responses to replies should be filed;
- Dates by which parties' pre-trial statements should be filed;
- Dates by which *in limine* and Daubert motions and responses thereto should be filed;
- Dates on which motions *in limine* and Daubert motions shall be heard;
- Dates proposed for final pre-trial conference;
- Presumptive and final trial dates.

See Appendix to the Local Rules of the United States District Court for the Western District of Pennsylvania LCvR 16.1A, ¶ 12. If the parties have failed to agree with regard to any subject for which a report is required as set forth above, the Report filed shall briefly set forth the position of each party with regard to each matter on which agreement has not been reached. See LCvR 16.1A, ¶ 15.

  
Maurice B. Cohill, Jr.  
Senior United States District Court Judge